

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ALTAFLO, LLC,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

DUN & BRADSTREET CREDIBILITY  
CORPORATION; DUN & BRADSTREET  
CORPORATION; and DUN & BRADSTREET,  
INC.,

Defendants.

No. C14-1288TSZ

**STIPULATED MOTION  
EXTENDING DEADLINES FOR  
DEFENDANTS TO FILE  
RESPONSES TO THE  
COMPLAINT**

NOTE ON MOTION CALENDAR:  
August 21, 2014

**I. STIPULATED MOTION**

WHEREAS, Plaintiff initially filed a Complaint in the above-captioned action (the  
“Action”) in the District of New Jersey on June 20, 2014;

WHEREAS, the Action has been transferred to this Court from the District of New Jersey  
as it arises from similar facts, asserts substantially the same claims, and is being brought on  
behalf of Plaintiff by the same counsel as the first-filed matter of *O&R Construction, Inc. v. Dun  
& Bradstreet Credibility Corp., et al.*, Case No. 12-cv-2184, which currently is pending before  
the Honorable Thomas S. Zilly of this Court;

WHEREAS, since the time that the *O&R Construction* action was filed, three cases in

1 addition to this Action have been filed in other federal district courts on behalf of other plaintiffs,  
 2 also represented by Plaintiff's counsel (*Die-Mension, Inc. v. Dun & Bradstreet Credibility Corp.,*  
 3 *et al.* (N.D. Ohio Case No.14-cv-392); *Vinotemp Int'l Corp., et al. v. Dun & Bradstreet*  
 4 *Credibility Corp., et al.* (C.D. Cal. Case No. 14-cv-451); and *Flow Sciences Inc. v. Dun &*  
 5 *Bradstreet Credibility Corp., et al.* (E.D.N.C. Case No. 14-128)), each of which arise from  
 6 similar facts and assert substantially the same claims as both this Action and the *O&R*  
 7 *Construction* matter;

9 WHEREAS, the related *Die-Mension* and *Vinotemp* actions now have been transferred to  
 10 this Court and currently are pending as *Die-Mension, Inc. v. Dun & Bradstreet Credibility Corp.,*  
 11 *et al.* (W.D. Wash. Case No. 14-cv-00855-TSZ) and *Vinotemp Int'l Corp., et al. v. Dun &*  
 12 *Bradstreet Credibility Corp., et al.* (W.D. Wash. Case No. 14-cv-01021), respectively;

14 WHEREAS, on August 4, 2014, Defendants moved the Eastern District of North  
 15 Carolina to have the related *Flow Sciences* action transferred to this Court;

16 WHEREAS, Plaintiff's counsel have stated that they will not oppose the transfer motion  
 17 in the *Flow Sciences* action;

19 WHEREAS, as of the date of this Stipulation, the Eastern District of North Carolina has  
 20 not yet ruled on the transfer motion in the *Flow Sciences* action;

21 WHEREAS, the parties agree that it is in the interest of judicial efficiency for there to be  
 22 a uniform date for Defendants to respond to the complaints in all of these actions;

24 NOW THEREFORE, Plaintiff and Defendants, by their respective counsel of record,  
 25 HEREBY MOVE THE COURT TO GRANT THE FOLLOWING STIPULATION:

26 1. Defendants' respective deadlines to respond to the Complaint in this Action shall  
 27 be extended until 30 days after the *Flow Sciences* action listed above has been transferred to this  
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1 Court, with the intention that the parties will then stipulate to a uniform date for Defendants to  
2 file their responses to the complaints in each of the newly-filed cases, and a briefing schedule for  
3 any motion to dismiss.

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STIPULATED MOTION – DEADLINES FOR  
DEFENDANTS TO RESPOND TO INITIAL COMPLAINT- 3  
NO. C14-1288TSZ

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DATED: August 21, 2014.

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STIPULATED MOTION – DEADLINES FOR  
DEFENDANTS TO RESPOND TO INITIAL COMPLAINT- 4  
NO. C14-1288TSZ

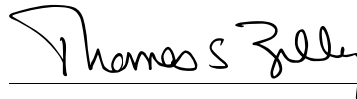
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**II. ORDER**

The Court has considered the foregoing stipulated motion related to pleading deadlines and having reviewed the records on file and this motion, the Court hereby orders that the stipulated motion, docket no. 11, is GRANTED, and the defendants' respective deadlines to respond to plaintiff's Complaint shall be extended to 30 days after the following case is transferred to this district: *Flow Sciences Inc. v. Dun & Bradstreet Credibility Corp., et al.* (E.D.N.C. Case No. 14-128).

The Court hereby WAIVES the pro hac vice filing fee for any attorneys admitted pro hac vice in related case 12-cv-2184.

Dated this 10th day of September, 2014.



THOMAS S. ZILLY  
United States District Judge